

Ref: Docket 16-239

I have got interested in Radio before High School, became an Electrical Engineer and have been designing radio receivers for over 50 years. I have participated in NAB and IEEE rule making committees while working on Broadcast receivers and got my radio Amateur License several years ago. My main interest in getting my license was to be able to support emergency radio communications for the town in which I am the Emergency Management Director.

The 300 baud limit the Amateur Radio community has been living with does not make much sense to me. All other services are channelized and have the channel bandwidth set by the FCC. I recently lived through the change from 25 to 12.5kHz channels for Public Service Radio. Included in this is the ability to have two 6.25kHz channels to be able to transmit data along with voice messages.

We would not have digital TV if the baud rate was limited to the analog TV rate. Complex modulation (256QAM) has enabled digital TV signals to fit in the same bandwidth as the old analog TV. FM broadcast now has analog as well as digital signals in the same occupied bandwidth.

Changing the HF Amateur Radio from a baud rate to Occupied Bandwidth would be a welcome change. I have been impressed with the innovation by the Amateur radio community, and the old Baud limit only restricts innovation as well as being confusing when trying to select a complex modulation scheme.

I have read some of the claims by Mr. Rappaport and am surprised that someone with his education would make such ridiculous claims. Drug and terrorist groups have almost unlimited money and resources available to use any kind of communication which will support their operations. Restricting Amateur Radio would have no effect on their operations.

Jon GrosJean
KB1SWW